

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

**CONSOLIDATED UNDER
CASE NO. 05-10155 PBS**

YISEL DEAN, et. al.,

Plaintiff,

v.

RAYTHEON COMPANY, et al.,

Defendants.

Case No.: 05 CV 10155 PBS

LISA A. WEILER, et. al.,

Plaintiff,

v.

RAYTHEON COMPANY, et al.,

Defendants.

Case No.: 05 CV 10364 PBS

JOINT MOTION TO EXTEND DISCOVERY DEADLINES

The parties respectfully move the Court to extend the discovery deadlines previously ordered by the Court. In support of this Motion, the parties state as follows:

1. The parties have been working diligently to complete fact discovery as outlined in Magistrate Judge Sorokin's order of March 2, 2006 [docket # 85].
2. Due to difficulty in scheduling the depositions outlined in Magistrate Judge Sorokin's order, the parties have agreed to extend the discovery deadlines adopted

by this Court on March 15, 2006 [granting the parties' proposed schedule, docket # 86].

3. Counsel have conferred and propose the following changes to the schedule:

	<u>Current Deadline</u>	<u>Proposed Deadline</u>
Fact discovery:	5/24/06	6/30/06
Plaintiffs' Expert Designation:	6/9/06	7/21/06
Defendants' Expert Designation:	7/10/06	8/25/06
Expert Discovery:	8/11/06	10/1/06
Summary Judgment Motion Filings:	9/18/06	10/18/06
Opposition to Summary Judgment:	10/13/06	11/13/06
Hearing on Summary Judgment:	11/17/06	12/15/06
Final Pretrial Conference:	2/15/07	2/15/07
Jury Trial:	2/26/07	2/26/07

4. The proposed new schedule will not interfere with the pretrial conference, or trial dates previously set by the Court.

WHEREFORE, the parties jointly move that the discovery and motion deadlines be changed as proposed above.

Respectfully Submitted,

Attorneys for the Plaintiffs

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Dated: July 11, 2006

CERTIFICATE OF SERVICE

I, Jacob T. Elberg, hereby certify that a true and correct copy of this document(s) filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as nonregistered participants on July 11, 2006.

/s/ Jacob T. Elberg

CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1(A)(2)

I, David A. Bunis, hereby certify that on July 5, 2006, I conferred with Defendant's counsel, Michael Jones, pursuant to Local Rule 7.1(A)(2). Defendant's counsel assents to this motion.

/s/ David A. Bunis

Date: July 11, 2006